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11 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
12 SOUTHERN DIVISION

13 VEG CORP., INC,)	Case No. 2:17-CV-02893-JCM-NJK
)	
14 Petitioner,)	JOINT MOTION FOR SIXTY-DAY
)	EXTENSION FOR UNITED STATES
15 v.)	TO RESPOND TO PETITION
)	
16 UNITED STATES OF AMERICA,)	FIRST REQUEST
)	
17 <u>Respondent.</u>)	LR IA 6-1, 6-2 and 7-1

18 COMES now Petitioner Veg. Corp., Inc. and Respondent United States of America, by
19 and through their undersigned counsel, and submit a Joint Motion to extend the time in which the
20 United States has to respond to the Petition for a period of sixty (60) days:

21 1. On November 17, 2017, Veg Corp., Inc. ("Veg Corp.") filed its petition to quash a
22 Formal Document Request issued by the Internal Revenue Service ("IRS") to Petitioner with
23 respect to foreign-based documentation in accordance with 26 U.S.C. (IRC) § 982(c)(2).
24
25

1 2. The IRS is conducting an audit examination of Veg Corp.’s corporate income tax
2 return for the year 2013. In connection with the examination, the IRS issued several Information
3 Document Requests (“IDR”) to Veg Corp.

4 3. On August 21, 2017, the IRS issued a Formal Document Request to Veg Corp.
5 under IRC § 982 in which it contended that Veg Corp.’s responses to the IDRs were insufficient
6 or incomplete. On November 15, 2017, the IRS granted Veg Corp an extension until December
7 15, 2017 in which to respond to the Formal Document Request.

8 4. Veg Corp. has now filed this Petition to quash the Formal Document Request in
9 accordance with IRC § 982(c)(2) for the reasons stated in its Petition.

10 5. On or about November 22, 2017, the Petitioner served the United States Attorney
11 for the District of Nevada with a copy of the Summons and Petition. The United States response
12 to the Petition is currently due by January 22, 2018.

13 6. By this Joint Motion, the United States seeks a sixty-day extension until March
14 23, 2018 in which to respond to the Petition.

15 7. The additional time sought will allow counsel for the United States to carefully
16 consider the merits of the claims raised by the Petitioner, and give sufficient time to the parties to
17 discuss narrowing or clarifying the issues involved herein.

18
19 DATED: December 21, 2017

/s/Henry C. Darmstadter
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2 DATED: December 21, 2017

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10 IT IS SO ORDERED.

11 
12 NANCY J. KOPPE
13 UNITED STATES MAGISTRATE JUDGE

14 DATED: December 22, 2017